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DISTRICT COURT
CLARK COUNTY, NEVADA

Guadalupe Lucinda Valdez-Valenzuela,
Plaintiff,

vs.

Cardenas Markets, LLC d/b/a Cardenas; Does I-X,
inclusive, and Roe Corporations I-X, inclusive,
Defendant.

Case No.: A-22-847414-C
Dept. No.: 4

**Cardenas Markets, LLC's Answer to
Complaint**

1. Admit.
2. Admit.
3. Admit.
4. Cardenas Markets, LLC ("Cardenas") lacks information sufficient to determine the accuracy of the allegations contained in this paragraph, so it denies them.
5. Admit.
6. Cardenas admits she slipped and fell in the store, but denies the remaining allegations in this paragraph.
7. Deny.
8. Deny.
9. Cardenas lacks information sufficient to determine the accuracy of the allegations contained in this paragraph, so it denies them.
10. Deny.
11. Deny.

1 12. Deny.

2 13. Deny.

3 14. Cardenas repeats its responses to prior paragraphs.

4 15. Deny.

5 16. Deny.

6 17. Deny.

7 18. Deny.

8 19. Deny.

9 20. Deny.

10 21. Deny.

11 **Affirmative Defenses**

12 1. Plaintiff was comparatively negligent.

13 2. The hazard Plaintiff alleges was open and obvious.

14 3. The event alleged in the complaint was caused by an intervening, superseding cause.

15 4. The event alleged in the complaint was solely caused by a non-party.

16 5. Plaintiff did not mitigate damages.

17 **Request for Relief**

18 Cardenas requests the case against it be dismissed with prejudice.

19 DATED this 23rd day of February, 2022.



21
22 BY: /s/ Michael Lowry

23 MICHAEL P. LOWRY

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25 6689 Las Vegas Boulevard South, Suite 200

26 Las Vegas, NV 89119

27 Attorneys for Cardenas Markets, LLC

Certificate of Service

Pursuant to NRCP 5, I certify that I am an employee of Wilson Elser Moskowitz Edelman & Dicker LLP, and that on February 23, 2022, I served **Cardenas Markets, LLC's Answer to Complaint** as follows:

- ☐ by placing same to be deposited for mailing in the United States Mail, in a sealed envelope upon which first class postage was prepaid in Las Vegas, Nevada;
- ☒ via electronic means by operation of the Court's electronic filing system, upon each party in this case who is registered as an electronic case filing user with the Clerk;

De Castroverde Law Group 1149 South Maryland Parkway Las Vegas, NV 89104 Attorneys for Plaintiff	
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BY: /s/ Amanda Hill
An Employee of



Kiwanuka, Alexa

From: no-reply@efilingmail.tylertech.cloud
Sent: Wednesday, February 23, 2022 10:37 AM
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Notification of Service

Case Number: A-22-847414-C

Case Style: Guadalupe Valdez-Valenzuela,
 Plaintiff(s)vs.Cardenas Markets, LLC,
 Defendant(s)

Envelope Number: 9406277



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Filing Details	
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